

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

COBB COUNTY, GEORGIA,

Plaintiff,

v.

Case No. 1:24-cv-00045-LMM

TYLER TECHNOLOGIES, INC.,

Defendant.

**CONSENT MOTION TO EXTEND TIME FOR RESPONSE TO
DEFENDANT’S MOTION TO MORE DEFINITE STATEMENT**

Plaintiff, Cobb County, Georgia (“Plaintiff”), pursuant to Federal Rule of Civil Procedure 6(b)(1)(A), files this Consent Motion to Extend Time for Response to Defendant’s Motion for More Definite Statement, showing the Court as follows:

1. Defendant, Tyler Technologies, Inc. (“Defendant”), filed a Motion for More Definite Statement on January 9, 2024.
2. Pursuant to LR 7.1(B), any party opposing a motion shall serve the party’s response not later than fourteen (14) days after service of the motion.

Accordingly, Plaintiff’s response is due on January 23, 2024.

3. Plaintiff requests a one-week extension to its Response to Defendant's Motion for More Definite Statement because counsel for Plaintiff were in an arbitration for another matter – from January 9, 2024, through January 18, 2024. As such, Plaintiff's new deadline to respond will be January 30, 2024.
4. The undersigned counsel for Plaintiff and Defendant have conferred, and Defendant consents to Plaintiff's requested extension to respond to Defendant's Motion for More Definite Statement.
5. This motion is made before Plaintiff's current deadline to respond to Defendant's Motion for More Definite Statement.
6. Accordingly, Plaintiff respectfully requests that the Court grant this Consent Motion and allow an extension of time until January 31, 2024, for the response of the motion for more definite statement.

Respectfully submitted this 19th day of January 2024.

By:

/s/ David R. Cook
David R. Cook Jr.
Georgia Bar No. 435130
Kelly M. Henning
Georgia Bar No. 586465

AUTRY, HALL & COOK LLP
3330 Cumberland Blvd, Suite 185
Atlanta, GA 30339
cook@ahclaw.com
henning@ahclaw.com
(770) 818 -4442

Consented to by:

Robert C. Khayat, Jr.
Georgia Bar No. 416981
Brian D. Spielman
Georgia Bar No. 596026
*Counsel for Defendant Tyler
Technologies, Inc.*

KHAYAT LAW FIRM
75 14th Street, N.E

H. William Rowling, Jr.,
County Attorney
Georgia Bar No. 617225
H.William.Rowling@CobbCounty.org

Suite 2750
Atlanta, GA 30309
RKhayat@khayatlawfirm.com
BSpielman@khayatlawfirm.com
(404) 978-2750

Lauren S. Bruce,
Assistant County Attorney
Georgia Bar No. 796642
Lauren.Bruce@CobbCounty.org

Kelly J. Long,
Senior Associate County Attorney
Georgia Bar No. 587945
Kelly.Pridgen@CobbCounty.org

COBB COUNTY ATTORNEY'S
OFFICE
100 Cherokee Street, Suite 350
Marietta, GA 30090
(770) 528-4000
Counsel for Plaintiff Cobb County

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 7.1D

I hereby certify that the foregoing was prepared in accordance with LR 5.1.

CERTIFICATE OF SERVICE

I hereby certify that on January 19, 2024, I electronically filed the **CONSENT MOTION TO EXTEND TIME FOR RESPONSE TO DEFENDANT’S MOTION TO MORE DEFINITE STATEMENT** with the Clerk of Court using the CM/ECF system, which will automatically send e-mail notification of such filing to the following attorneys of record:

Robert C. Khayat, Jr.
KHAYAT LAW FIRM
75 14th Street, N.E
Suite 2750
Atlanta, GA 30309
RKhayat@khayatlawfirm.com
BSpielman@khayatlawfirm.com

This 19th day of January 2024

/s/ David R. Cook
David R. Cook Jr.
Georgia Bar No.
435130
cook@ahclaw.com

Autry, Hall & Cook LLP
3330 Cumberland Blvd, Suite 185
Atlanta, GA 30339
(770) 818-4442
Counsel for Plaintiff Cobb County